



ARMAS.BERTRAN.PIERI
TRIAL LAWYERS

J. ALFREDO ARMAS
EDUARDO E. BERTRAN
LUCIANO M. PIERI
admitted to practice in Florida
and Buenos Aires

SARAH
FRANC
NATAL

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 09/21/2023

September 20, 2023

By EFC & Email to:

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *MSP Recovery Claims Series, LLC v. AmTrust Insurance Company*, Case No. 1:21-cv-01011-AT

Dear Judge Torres:

The Parties write jointly to request that the Court stay all deadlines and proceedings in this matter for a period of ninety (90) days pending completion of their ongoing, but complex, settlement negotiations.


Over the last several months the Parties extensively conferred regarding various discovery disputes, including Plaintiff's requests to exchange information regarding historical claims. The Parties' good faith conferences transitioned into meaningful settlement discussions, which have steadily progressed.

The Parties have had multiple settlement conferences, including an extensive conference held on August 24, 2023, which involved executives from both Plaintiff and Defendants, but require additional time. Together, the Parties request that the Court afford them this brief stay so that the Parties may focus on settlement negotiations without impending discovery deadlines. The Parties respectfully submit that this stay is the most efficient means toward a potential resolution, and will conserve litigation and judicial resources while facilitating settlement negotiations.

This stay will not unduly delay the resolution of this litigation, as the Parties will diligently seek to finalize an agreement, or will reenter litigation and expeditiously work to complete discovery.

GRANTED IN PART. The Clerk of Court is directed to STAY all pending deadlines until **November 20, 2023**. By **November 16, 2023**, the parties shall file a joint letter with a status update as to settlement discussions. The case management conference scheduled for November 7, 2023, is adjourned *sine die*.

Dated: September 21, 2023
New York, New York



ANALISA TORRES
United States District Judge